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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 3, 2002

VIA COURIER

Marlene R. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ***Ex Parte***: WT Docket No. 01-108

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, this will provide notice that on May 2, 2002, Cloyce Newton (Director of Operations for Golf Technologies and Global Vehicle Communications, John Deere Technologies), Jason A. Francque (Manager, Federal Government Affairs for Deere & Company) and the undersigned met with Commissioner Kevin Martin and Sam Feder (Office of Commissioner Kevin Martin) concerning issues in the above-captioned proceeding. We urged the Commission to preserve the AMPS standard and channelization plan for at least 10 years. We explained that while Deere & Company has tried, and continues to try, to implement satellite solutions, neither satellite service, nor digital cellular service provide solutions for Deere & Company's telematic applications for reasons of coverage and equipment availability, as well as cost. We stressed the importance of other key issues before the Commission as set forth in Attachment 1 that was provided at the meeting. We also provided the Commissioner and Mr. Feder with a Deere & Company brochure that details the Company's construction product. This brochure is included as Attachment 2.

Sincerely,

Helen E. Disenhaus
Ronald W. Del Sesto, Jr.

cc: Commissioner Kevin Martin
Sam Feder

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ATTACHMENT 1

Talking Points

JOHN DEERE

DEERE SUPPORTS RETENTION OF AMPS STANDARD AND CHANNELIZATION PLAN FOR AT LEAST 10 YEARS

The Bottom Line

John Deere is a 164 year old company. The future of Deere is technology based.

This technology and these products are critical to improved efficiency and productivity in agriculture and the heavy equipment industry.

AMPS is the only ubiquitous, continuous-coverage service with universal compatibility in the US, and will likely be the only one for 10 years.

Deere has invested millions of dollars in development and implementation of AMPS-based communication server technologies (hardware and software).

AMPS is the only service that works in the U.S. We tried satellite without success. We use GSM very successfully in Europe.

We understand the FCC is leaning towards deregulation. If left to the market, AMPS will not likely survive because only rural areas have no alternatives.

Hardened dual mode modems are not available.

Next generation hardware platform design has been put on hold due to lack of availability of a dual mode modem.

Background

Deere & Company is a leader in bringing advanced telecommunications-based services, including telematics applications, to the agricultural,construction and commercial equipment industries.

Deere's telecommunications-based services include:

GreenStar™ Precision Farming System
DeereTrax ™ Vehicle Fleet Management System for Construction Industry
JDLink ™ Machine Messenger Advanced Management System for Machines and Operators for the Agriculture Industry

Deere not wedded to particular type of communications service
- Choice is application-specific, dictated by application's requirements

DeereTrax™ and JDLink™ Rely on Advanced Mobile Phone Service ("AMPS")

Offers ubiquitous, continuous-coverage service with universal compatibility
- Vehicles often in rural areas
- Vehicles move between rural and urban areas in a single day
- Vehicles move through multiple providers' service areas

Channelization plan ensures seamless compatibility
- No interruptions when moving between territories of different service providers

Industry-hardened, robust modems available

Compatible with Deere and third party legacy products that will be in use for many years
- Rural and agricultural operators often have no other service options
- Equipment integrated into vehicles – not a simple handset replacement issue
- Smaller companies particularly use after-market equipment and would be hardest-hit by premature phase-out

Digital Service Not Yet a Viable Option in the U.S.

No common standard
- Defeats necessary compatibility

No mandatory coverage rules ensuring ubiquity
- Rural areas not assured of coverage

No industry-hardened modems
- None likely until common 3G standard -- many years away
- Dual-mode modems similarly unavailable

Leaves legacy equipment users high and dry
- Retrofitting and replacement expensive
- Not an option for rural coverage

AMPS and Current Channelization Plan Should Remain in Place for 10 Years

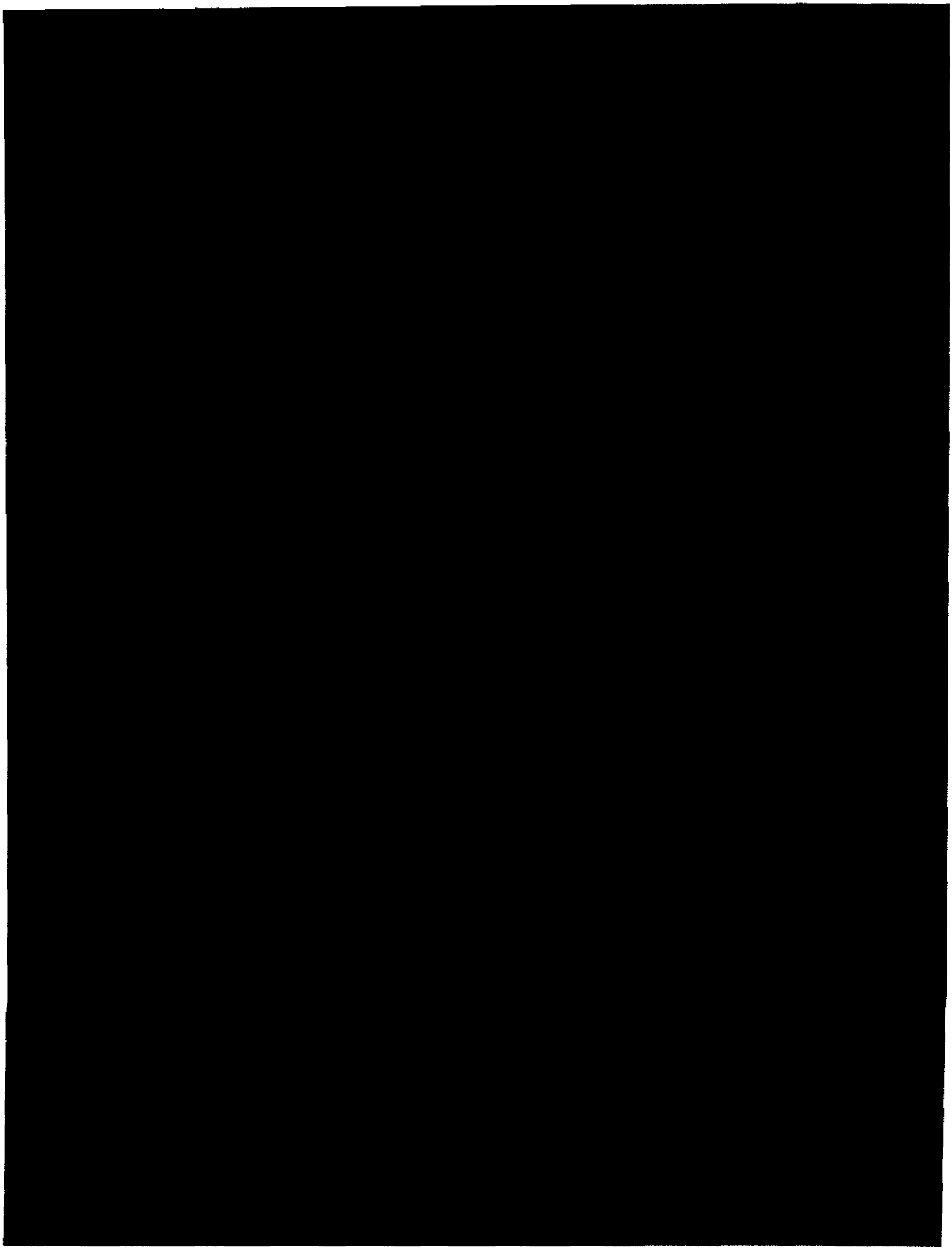
Corresponds to heavy equipment life-cycles

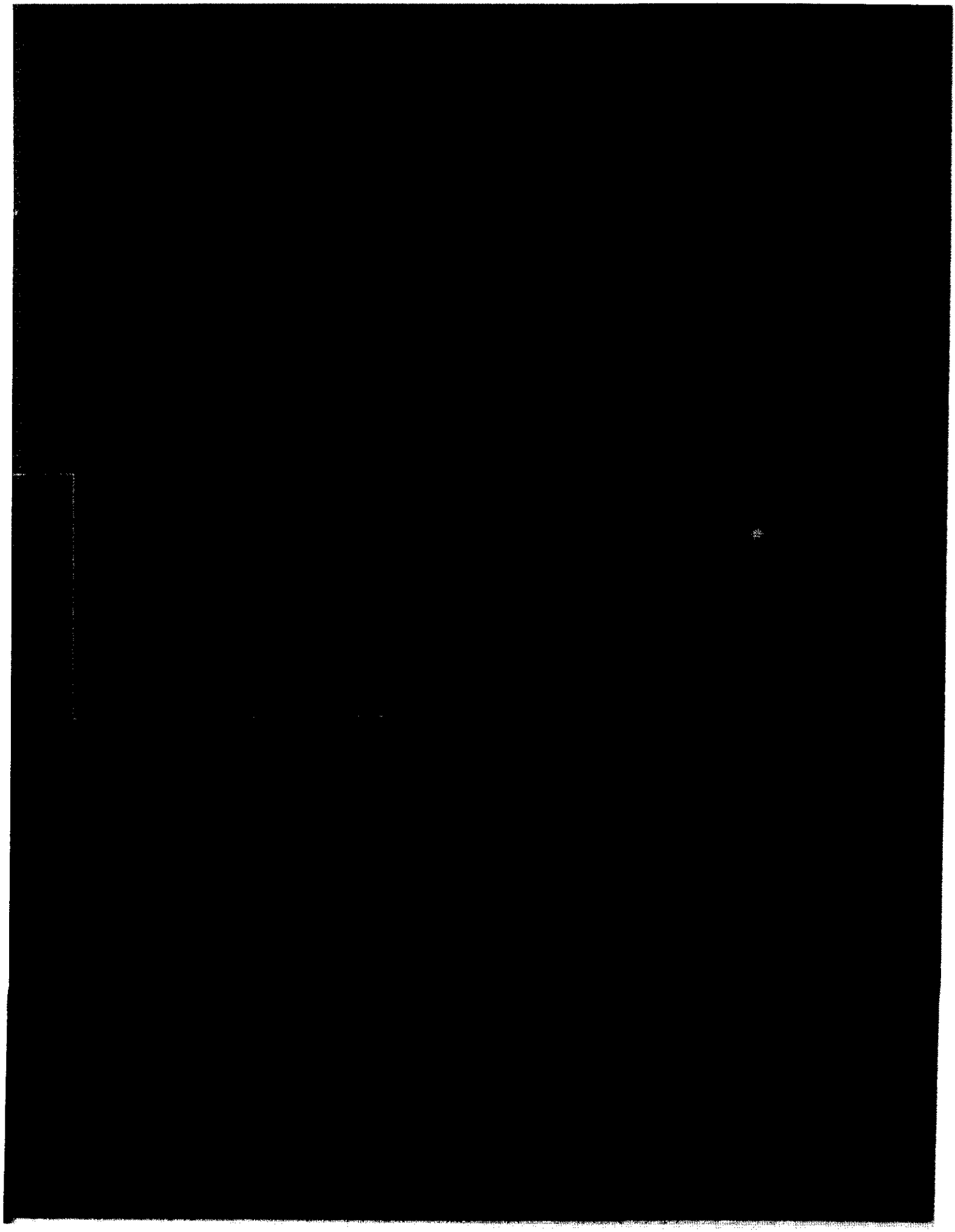
3G common standard more likely

Digital deployment more extensive

ATTACHMENT 2

Deere & Company Brochure



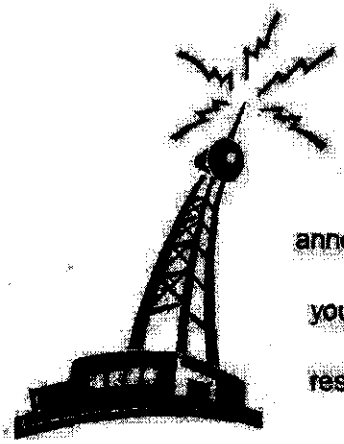


The more we do,

THE MORE WE DO, THE MORE THERE IS TO DO.

the more there is to do.

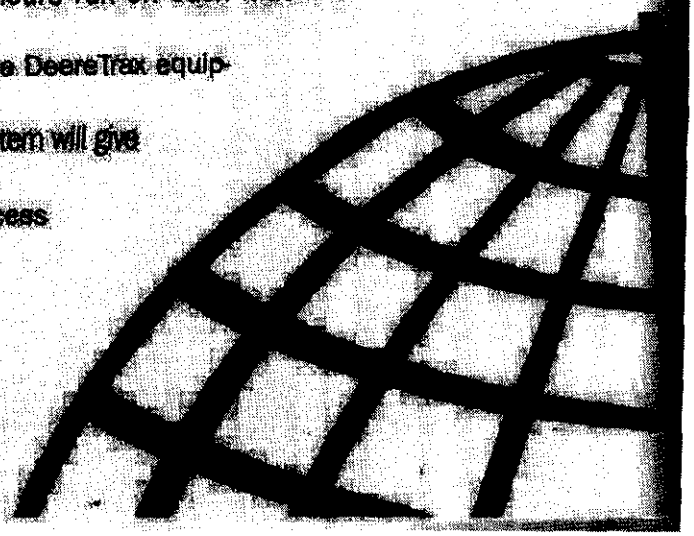
We live in a time when things are constantly on the move. The more places you can be at one time, the better off you are. Time management is so important to your success. That's why John Deere is continually looking for ways that will allow you to get more done, in less time.

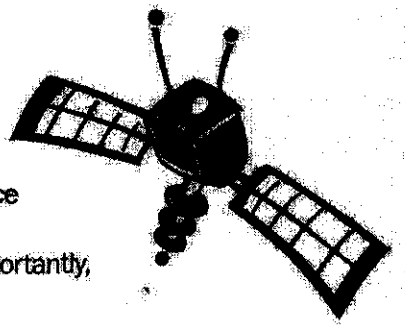


As a proven leader in innovation and technology, John Deere is pleased to announce a new service that can change the way you do business, resulting in long-term positive results for your bottom line.

DeereTrax equipment tracking system is a new product designed specifically to solve many of your equipment-maintenance needs. Not only does it give you a quick, convenient, and accurate way to pinpoint the location of your machines, it also provides you with the number of hours run on each machine.

Installation of the DeereTrax equipment tracking system will give you electronic access

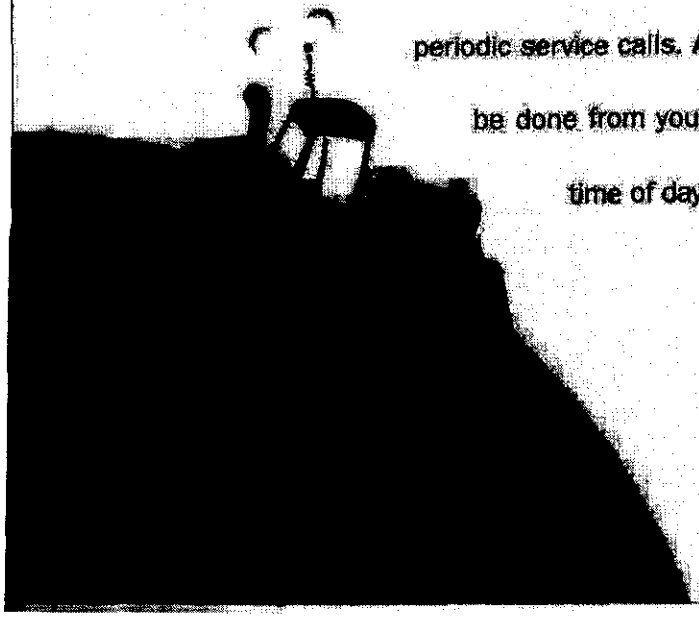




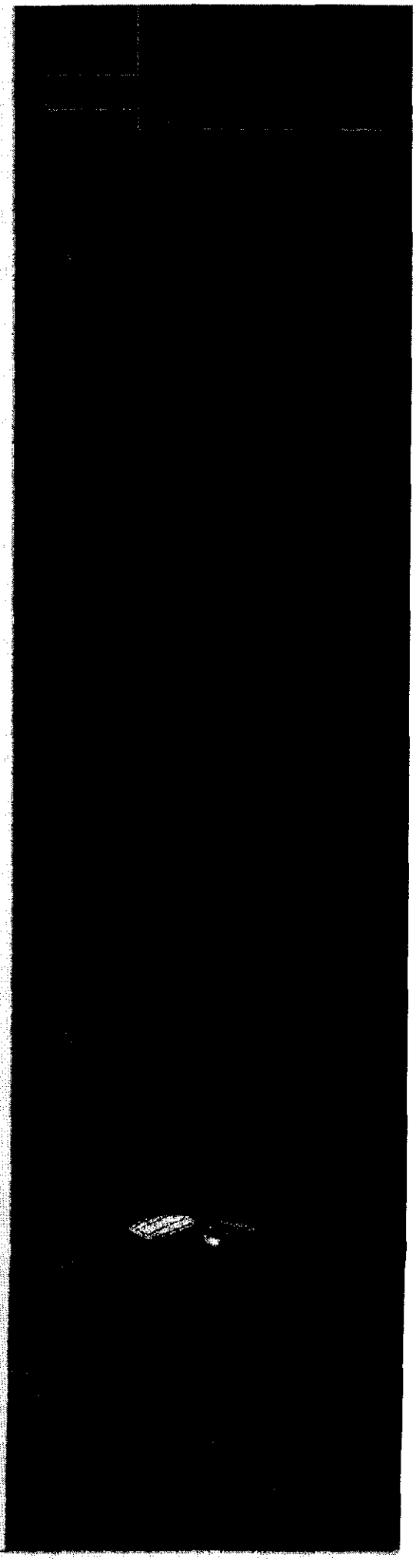
to this information, providing you with effortless tracking of the maintenance needs of your equipment. And, more importantly, it can all be done from your desk.

Designed to outfit your entire fleet, it's obvious why this unique product isn't Deere specific. The DeereTrax equipment tracking system will fit any brand and any type of equipment. No matter the name — or the model — DeereTrax will work for you. But don't stop there. The DeereTrax system also effectively tracks smaller machines, even pickup and service trucks.

Imagine the maintenance program you could set up. And it would be easy. Once each machine is equipped with the necessary hardware, all the answers you need are at your fingertips. You can download the information into your maintenance software or an Excel spreadsheet. Hit "print" on your computer and you have everything you need to effectively schedule periodic service calls. And all of this can be done from your office — at any time of day or night.



DEERE -TRAX-
EQUIPMENT TRACKING SYSTEM



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Automatically tracks machine location

Great for multiple pieces of equipment on multiple jobsites

Lets you know where each DeereTrax-equipped machine is located

[redacted]

Attractive purchase price

You will want to equip your entire fleet

[redacted]

All-makes application

Can easily be used for all makes and models of equipment, including service and delivery trucks

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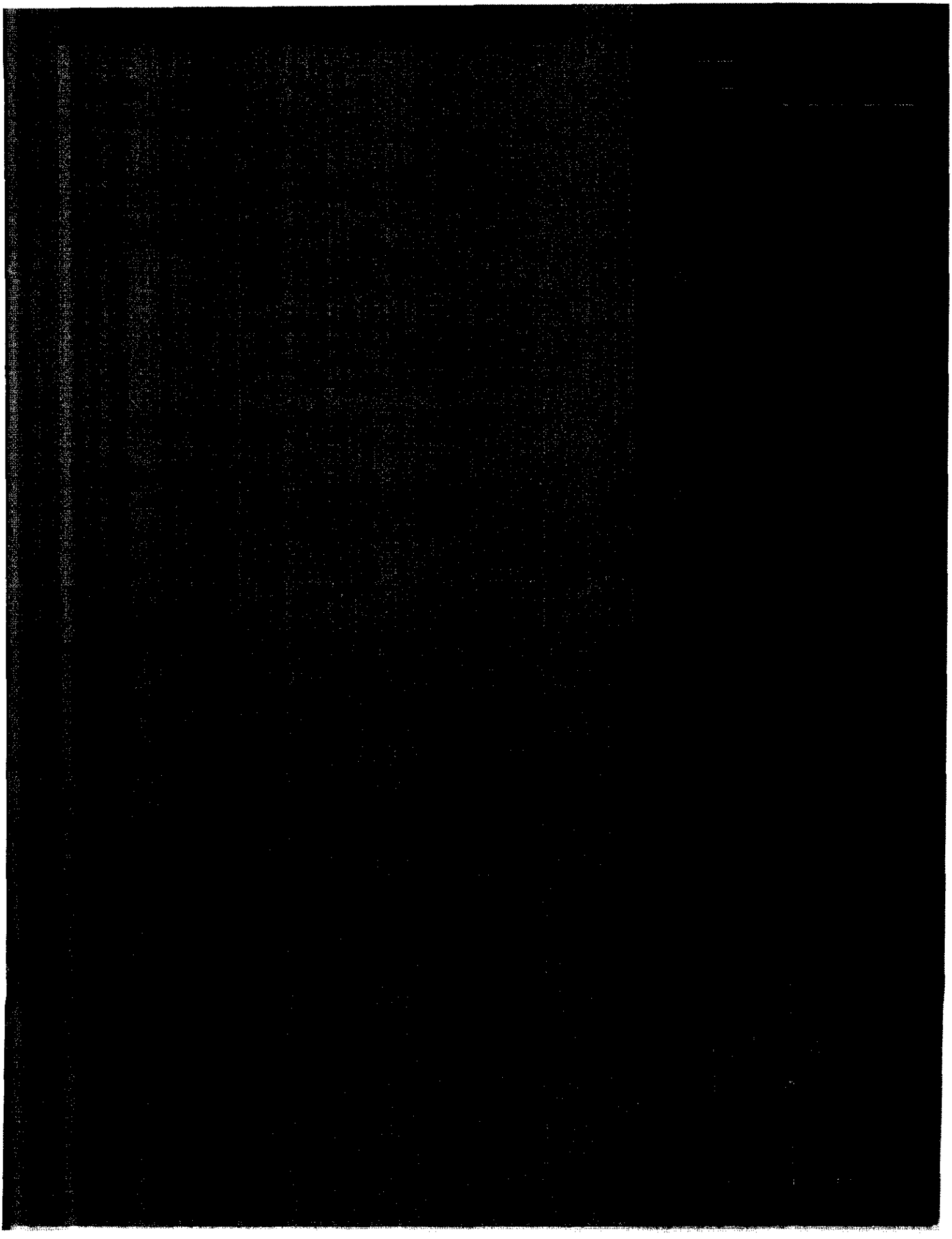

DEERE & COMPANY

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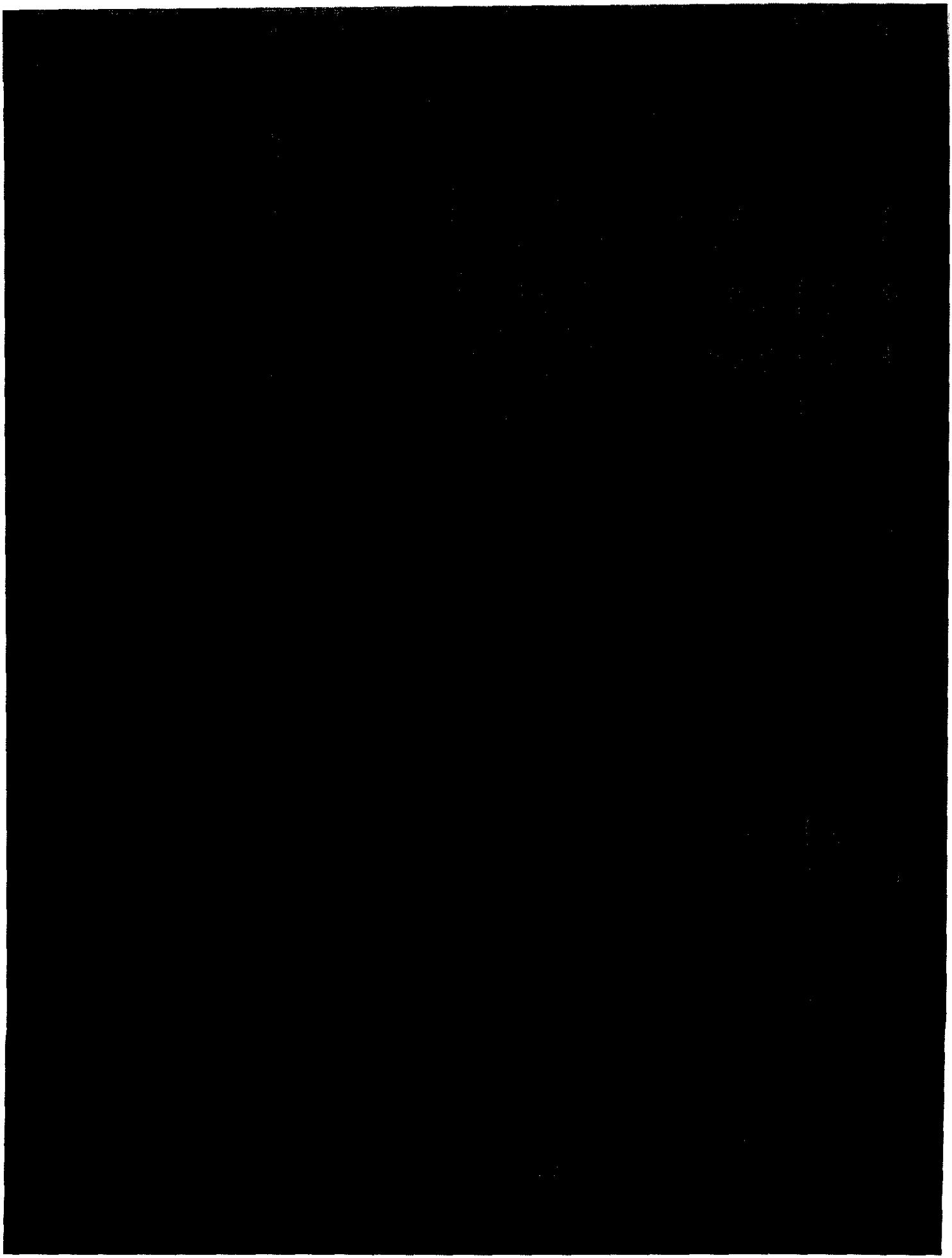
HTTP://DPS.DEERE.COM

DKD21619 Litho in U.S.A. (00-00)

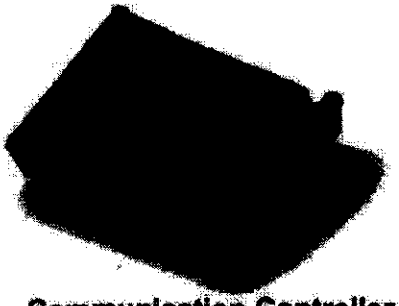


DEERE -TRAX-

EQUIPMENT TRACKING SYSTEM

Fleet Management Technology

Built to John Deere stringent quality standards, the DeereTrax Communication Controller was specifically designed for the heavy equipment environment. Enclosed in an all-aluminum, ruggedized housing are the modem, microprocessor, and interface board.



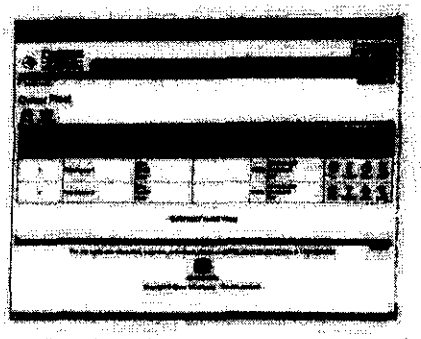
Communication Controller

Power management logic is integral and helps to prevent excessive battery drain problems on idle equipment. Low-profile antennas are included for both the cellular transceiver and GPS receiver, and all cabling is armor covered.

Cellular Antenna

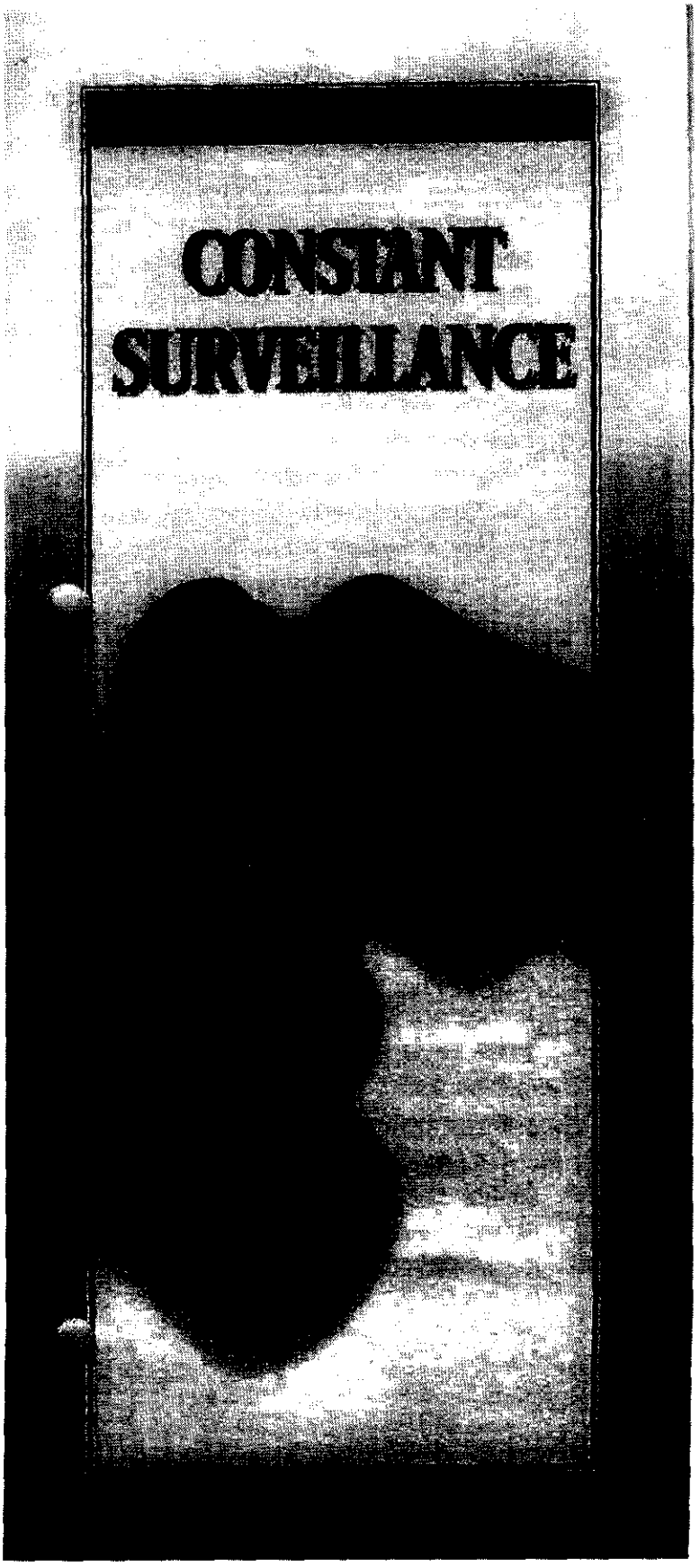
GPS Antenna

The standard web-based software allows for the collection and monitoring of engine run hours, location and work site management. The software can also maintain preventive maintenance records and monitor asset utilization. Depending upon customer need, additional information can be collected and transmitted through the configurable I/O ports.



Features

JOHN DEERE


CONSTANT
SURVEILLANCE

Specification Sheet

DEERE -TRAX-

General Specifications

Operating Voltage 12-32 VDC

Power Consumption	13.6 VDC	24 VDC
Transmit:	900ma	450ma
Full Power Mode:	250ma	130ma
Ears On Mode:	95ma	50ma
Power Save Sleep:	2.5ma	4ma

Memory 512 kB of Flash memory for code updates and message data storage

Processor Hitachi H8/3644F

I/O Ports Spare - Available for customer use

(1) General Purpose Programmable I/O
(0-5)v Analog/Digital Input
(0-5)v CMOS Digital Output

(1) Opto Isolated Input
Input Impedance: 10k
Max differential input voltage: +/-35V
continuous isolation: 1500V between the input and output

Modem Bell 212A (1200 bps)

Physical Specifications

Communications Controller

Dimensions	7"W x 2.25"H x 9.5"H
Weight	3.5# lbs.
Enclosure	Heavy-duty aluminum, water tight
Mounting	Stainless steel bracket included
Connectors	Water Resistant
Cabling	Heavy-duty pre-assembled, 15 ft.

GPS Antenna

Dimensions	3.4"D x 0.90"H
Weight	4 oz.
Electronics	Active - 5 VDC at 20ma - 28 dB gain
Mounting	TNC connector
Connectors	RP (reverse polarity) TNC
Cabling	17 ft. Teflon Coax
Receiver	Internal, L1 frequency (1575.42 MHz), C/A Code 12 Channel Continuous Tracking
Update Rate	1 Hz
Accuracy	+/- 25 meters without SA
Velocity	+/- 0.1m/sec (typ.)
Acquisition	Cold Start < 60 seconds (avg.) Warm Start < 40 seconds (avg.) Hot start, 8 seconds (avg.)
Satellite Reacquisition Time:	100 msecs
Minimum Signal Tracked:	-170 dBW

Cellular Antenna

Dimensions	1.5"D x 2.5"H
Weight	6 oz.
Electronics	3 dB gain
Mounting	Motorola NMO
Connectors	TNC
Cabling	17 ft. Teflon Coax

Cellular Antenna Physical Specs - Continued

AMPS (Advanced Mobile Phone Service)
Transceiver: Class III, 631 Milliwatt output
Frequencies: Transmit Frequency: 824-849 MHz
Receive Frequency: 869-894 MHz

Environmental Specifications

Operating Temp	70C to -20C
Storage Temp	+105C and -55C
Operating Humidity	70% RH at 75C, 303 Hg (partial vapor pressure)
Storage Humidity	95% RH at 40C
Vibration	5g's peak with 1.5mm peak-to-peak displacement in 3 axes
Operating Shock	50 g's
Inorganic Dust	Dust particles sealing to 40 micron
Cleaning	Connector: Tested to 375 kPa (55 psi) spray wash held at 1m with no impaired functions Enclosure: Waterproof
Salt Spray	Tested 35C for 48 hours with atomized NaCl with no detrimental corrosion or impaired function
Splash	Tested various chemicals to include, but are not limited to, fuels, light cards, ethylene glycol, rain, battery acids, detergent, paints and fertilizers with no detrimental corrosion or impaired function
Electrical Transients	Inductive load switching of 600 FAC for 1ms survivability
Reverse Polarity Protection	Yes
Jump Start	+26.5 VDC at 70C for 5 minutes
Short Circuit Protection	Internal for all connection points
Electrostatic Discharge	Internally protected electrostatic discharge per IEC-801-2

Approvals and Ratings

FCC Part 22 Subpart H, FCC Part 15	Compliance with electromagnetic compatibility requirements
Industry Canada RSS-119	Compliance with electromagnetic compatibility requirements
John Deere Standard 53.2	Environmental Design & Testing of Electronic & Electrical Components

John Deere Electronic Technologies Group, Global Vehicle Communications
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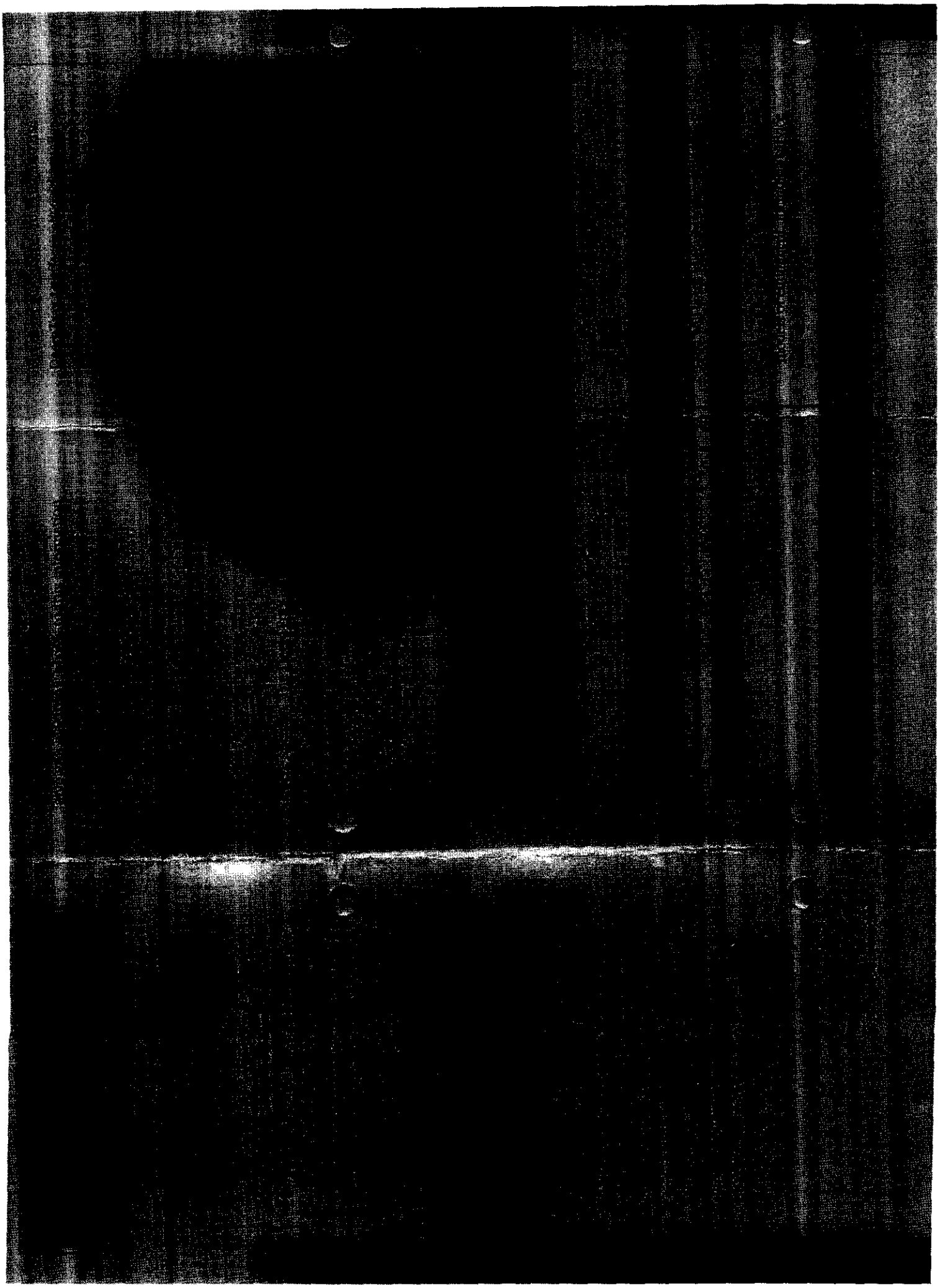
Alpharetta, GA 30022 877-358-5015



Each machine is outfitted with a simple tracking kit that takes a minimum amount of time to install. And you don't need to go to your dealer for installation, you can do it in your own shop.

Each DeereTrax equipment tracking system kit contains two antennas (one communications and one Global Positioning System GPS), that mount onto the machine. A communications controller is also mounted to the machine and powered through the alternator connections. Location information is received from the GPS satellite system and "matched" with the internal clock, logging the machine hours. This combined data is sent to the remote database via the wireless modem. Then, with a click of a button, you have the capability to access the information using maintenance software or the provided Excel spreadsheet.

You don't have the time – or the staff – necessary to track your equipment? No problem – your John Deere dealer's staff can do it for you. They can provide a maintenance program custom designed to meet your needs and capable of detecting any maintenance service, before it's needed.

For contractors with large fleets at multiple locations, the DeereTrax equipment tracking system will provide a simple way of plotting periodic service calls. A planned maintenance strategy could be implemented to maximize equipment utilization.

But even if you're not a large contractor, the DeereTrax equipment tracking system can be a very important part of your success. The more places you can be at one time, the better off you are. Since time management is so important, DeereTrax will take the stress out of keeping track of your machine's location, along with providing an up-to-date account of the hours logged on it. And all of this can be done from your office – and at any time of day or night.

[redacted]

NOTHING RUNS LIKE A DEERE®

DKE2197 Litho in U.S.A. (01-02)